

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
2 A Limited Liability Partnership
3 Including Professional Corporations
4 JOY SIU, Nevada Bar No. 15095
5 1584 Villa Rica Drive
6 Henderson, NV 89052
7 Telephone: 415.774.3108
8 E mail: jsiu@sheppardmullin.com

9 PATRICIA M. JENG, Cal. Bar No. 272262
10 (*Pro Hac Vice*)
11 SAMI HASAN, Cal. Bar No. 272333
12 (*Pro Hac Vice*)
13 SHAYLA M. GRIFFIN, Cal. Bar No. 339821
14 (*Pro Hac Vice*)
15 Four Embarcadero Center, 17th Floor
16 San Francisco, California 94111-4109
17 Telephone: 415.434.9100
18 E mail: pjeng@sheppardmullin.com
19 shasan@sheppardmullin.com
20 smgriffin@sheppardmullin.com

21 Attorneys for Defendant
22 REGIS CORPORATION

23 UNITED STATES DISTRICT COURT
24 DISTRICT OF NEVADA

25 ANGELETTA PAIGE, an individual, on
26 behalf of herself and all others similarly
27 situated,

28 Plaintiff,

v.

ARCNV, INC. d/b/a ARCCO
ENTERPRISES; REGIS
CORPORATION d/b/a
SMARTSTYLES HAIR SALONS and
DOES 1-50, inclusive,

Defendants.

Case Number
2:25-cv-00954- CDS-DJA

**JOINT MOTION FOR ORDER TO
EXTEND DEFENDANT REGIS
CORPORATION'S DEADLINE TO
RESPOND TO FIRST AMENDED
COMPLAINT and ~~PROPOSED~~
ORDER**

(THIRD REQUEST)

Judge: Hon. Cristina D. Silva
Complaint Filed: May 30, 2025

1 Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rule 7-1(c), Plaintiff Angeletta Paige
2 (“Plaintiff”) by and through her counsel of record, RAFII & ASSOCIATES, P.C., and Defendant
3 REGIS CORPORATION d/b/a SMARTSTYLES HAIR SALONS (“Defendant” or “Regis”) by and
4 through its counsel of record, SHEPPARD, MULLIN, RICHTER & HAMPTON LLP jointly move
5 this Court for an Order that Defendant shall have an extension up to and including **December 8, 2025**,
6 in which to file a response to Plaintiff’s First Amended Complaint. This Joint Motion is submitted and
7 based on the following.

8 **WHEREAS**, on or about May 30, 2025, Plaintiff filed her original Complaint.

9 **WHEREAS**, on or about July 8, 2025, Regis timely answered Plaintiff’s Complaint.

10 **WHEREAS**, on or about September 22, 2025, Plaintiff filed a First Amended Complaint to
11 include additional claims against Regis;

12 **WHEREAS**, counsel for Regis and Plaintiff have met and conferred, and have agreed to
13 continue to meet and confer, regarding whether Regis is an appropriately named defendant and
14 employer of Plaintiff;

15 **WHEREAS**, counsel for Regis and Plaintiff have continued to have discussions regarding
16 whether Regis is an appropriately named defendant and employer of Plaintiff, with Defendant
17 providing informal information to Plaintiff to potentially provide an affidavit regarding various issues
18 as requested by Plaintiff;

19 **WHEREAS**, in order to allow the Parties to continue their discussions regarding a potential
20 dismissal of Regis, the Parties have agreed to extend the deadline for Regis to respond to Plaintiff’s
21 First Amended Complaint to December 8, 2025;

22 **WHEREAS**, Plaintiff’s counsel advised the Parties’ most recent meet and confer call that
23 Plaintiff would, alternatively, contemplate a dismissal *with* prejudice if there was interest in settlement
24 by Regis;

25 **WHEREAS**, Defendant has followed up with Plaintiff regarding the reasonableness of such a
26 proposal to determine whether settlement could be a potential resolution;

27 **WHEREAS**, this is the third request by the parties to extend the time for Regis to respond to
28 Plaintiff’s First Amended Complaint;

WHEREAS, the Parties believe these circumstances constitute good cause for granting an extension.

NOW THEREFORE THE PARTIES JOINTLY MOVE FOR AN ORDER for Defendant Regis Corporation to file an answer or otherwise respond to Plaintiff's First Amended Complaint by **December 8, 2025**.

Dated: November 5, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By */s/ Patricia M. Jeng*

JOY SIU

PATRICIA M. JENG

(Pro Hac Vice)

SAMI HASAN

(Pro Hac Vice)

SHAYLA M. GRIFFIN

(Pro Hac Vice)

Attorneys for Defendant
REGIS CORPORATION

Dated: November 5, 2025

By */s/ Rachel Mariner*

Rachel Mariner

Attorneys for Plaintiff

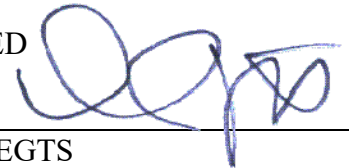
ANGELETTA PAIGE

ORDER

THE COURT GRANTS the Joint Motion to Extend Defendant Regis Corporation's Deadline to Respond to First Amended Complaint to December 8, 2025.

DATED: 11/13/2025

IT IS SO ORDERED



DANIEL J. ALBREGTS
UNITED STATES DISTRICT JUDGE